

EXHIBIT

No. 20

Cates, Emily

From: Bellew, Sean [SBellew@cozen.com]
Sent: Monday, February 27, 2006 7:45 AM
To: Papetti, Randy
Cc: Talbot, Cory; Cates, Emily; Bowser, William; Patrick, SherryAnn; Berry, Kevin F.; Felice, David A.
Subject: J-Squared v. Motorola

Randy:

We are writing to follow up on some outstanding discovery issues as we move toward the close of discovery on April 3, 2006.

Motion to Compel

As you are aware, we filed a comprehensive Motion to Compel last week. We understand that you and Cory were tied up and were unable to engage in a discussion regarding the issues highlighted in our motion before we filed it. We considered your request (as communicated by Emily), but in the end, we felt it prudent to file the motion in light of the pending discovery deadline. We are still very much open to a candid discussion on the deficiencies highlighted in our motion in an effort to avoid having to require you to formally respond to the motion and to avoid the Court having to hear the motion.

Under the local rules, you have 10 business days to answer our motion. While we did not specifically grant your request for additional time to discuss this before we filed the motion, we will certainly agree to extend the response deadline should you indicate that an amicable resolution can be had.

Expert Reports

Our expert report is currently due on Wednesday of this coming week – March 1, 2006. Our expert is going to need an additional week to complete a report. Accordingly, we are requesting an additional week to produce our report – until March 8, 2006. We will likewise extend your deadline one week until April 10, 2006. Let me know if this presents a problem at your earliest convenience so we can avoid having to petition the Court for the extra time. We will circulate an appropriate stipulation.

Depositions

As you know, Plaintiffs have a series of depositions that they still need to take. We are certain that you intend to take some depositions as well. Plaintiffs still need to take the following depositions: Motorola 30(b)(6) Representative, Edwin Kaczor, Larry Terry, Wendy Vittori (1/2 day), Nina (Guibor) Lockhart (1/2 day), Steve Cunha

and Jim McGregor. We are available to take these depositions on any of the following days in March: 13, 14, 15, 20, 21, 22, 23 24, 28, 29, 30 31. Please determine the availability of these witnesses and get back to us. Also, please let us know what your intentions are in connection with depositions of J-Squared's employees.

Outstanding Discovery

We have your deficiency letter and will respond shortly. In addition, I believe we are due some outstanding discovery as well. It may make sense to fold this into a discussion regarding our motion to compel. Let us know if you think this makes sense and when you are available to discuss these issues.

Please get back to me today. Thanks.

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

J-SQUARED TECHNOLOGIES, INC., a)	
Canadian corporation, and J-SQUARE)	
TECHNOLOGIES (OREGON) INC., an)	
Oregon corporation,)	
)	
Plaintiffs,)	
v.)	C.A. No. 04-CV-960-SLR
MOTOROLA, INC., a Delaware)	
corporation.)	
)	
Defendant.)	

CERTIFICATE OF SERVICE

I, William W. Bowser, Esquire, hereby certify that on this 13th day of March 2006, I electronically filed a true and correct copy of the foregoing **Motorola's Response to Plaintiffs' Motion to Compel along with its Exhibits 1 through 20 and this Certificate of Service** with the Clerk of the Court using CM/ECF, which will send notification that such filing is available for viewing and downloading to the following counsel of record:

David Allan Felice
Cozen & O'Connor
Chase Manhattan Centre, 1201 North Market, Suite 1400
Wilmington, DE 19801

I further certify that on I will mail on March 14, 2006, these same documents by United States Postal Service to the following non-registered participant:

Kevin F. Barry
Cozen & O'Connor
1900 Market Street
Philadelphia, PA 19103

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ William W. Bowser

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